

REMARKS

Independent claims 1, 9, 10, 11, 12, 13, 23, 25, and 30 are amended to include limitations related to two information storage modes. In the first mode the function, address, and control information is stored each time a memory request is received, and in the second mode the function, address, and control information stored responsive to function and address information in the memory request matching designated function and address information. Limitations are also included as to the stored information being function, address and control information of a memory request. The combination of these limitations along with the other claim limitations are not thought to be suggested by the cited prior art. Various dependent claims are amended for consistency with the amended independent claims.

New dependent claims 37-44 are added to claim further features related to different storage modes and different conditions for starting and stopping the storing of the memory request information. The specifically claimed modes and start/stop conditions are not understood to be suggested by the cited prior art.

Claim 6 is canceled without prejudice, and claims 1-5 and 7-44 are pending in the application. The amendments are made for the purpose of expediting prosecution and not for patentability, and the claim cancellation is made without prejudice. Applicants reserve the right to pursue subject matter of the original claims (prior to amendment) and subject matter of the canceled claims in subsequent prosecution.

The traversals of the claim rejections of the previous Office Actions and the arguments presented in response to those rejections, as set forth in previously filed amendments and responses, are maintained and incorporated by reference in this response.

The Office Action does not establish that claims 1-6 and 35-36 are unpatentable under 35 U.S.C. §103(a) over "Mann" (U.S. Patent No. 5,978,902 to Mann) in view of "Ryan" (U.S. Patent No. 6,530,076 to Ryan et al.) in further view of "Bryant" (U.S. Patent No. 6,728,949 to Bryant et al). The rejection is respectfully traversed because the Office Action does not establish a *prima facie* case of obviousness. The Office Action does not show that the combination teaches all the limitations, the alleged motivations for making the combination are based on hindsight, and it is not apparent

that the combination could be made with reasonable success. Applicant maintains the arguments presented in the previously filed responses and reserves the right to further argue the propriety of the motivation to combine such references if and/or when it is warranted, as the Applicant maintains the position that it is only with the benefit of hindsight that such references would be combined. The rejection is now moot, however, in view of the amendments made to the claims.

The Office Action does not establish that claims 7-18 and 23-34 are unpatentable under 35 U.S.C. §103(a) over Mann in view of Ryan, in view of Bryant and in further view of "Torrey" (U.S. Patent No. 6,145,123 to Torrey et al.). The rejection is respectfully traversed because the Office Action does not establish a *prima facie* case of obviousness. The rejection is also moot in view of the amendments made to the independent claims.

Furthermore, in regards to claim 12, it is not apparent how Ryan teaches the claim limitations of the dynamically-configurable write mode selection module further comprises means for enabling the function, address, and control information to be stored in the memory if the function, address, and control information changes from a first defined time to a second defined time, in response to a corresponding write mode selection identifier. The cited teaching of Ryan at col. 2, l. 40-46 contains no apparent reference to enabling if the recited information changes from a first time to a second time. An explanation is requested if the rejection is maintained.

Likewise, the limitations of claim 13 are not understood to be suggested by the cited sections of Mann and Torrey. Claim 13 includes limitations of, in response to a first write mode identifier the dynamically-configurable timing control module enables storing of the function, address, and control information each time a memory request is received, and in response to a second write mode identifier enables storing of the function, address, and control information responsive to function and address information in the memory request matching designated function and address information. Mann's col. 10 is cited as suggesting these limitations. However, there is no apparent correspondence of elements in this section of Mann to the storage being enabled in response to the function, address, and control information of a request being equal to some designated information.

The Office Action also cites Torrey's col. 31-35 as suggesting these limitations. However, Torrey has only 16 columns, and none of the other cited references have 35 columns. Thus, it appears that the Examiner intended to cite Mann's col. 31-35. Assuming that citation to Mann was intended, these columns do not contain any teaching that in any apparent way corresponds to the limitations of claim 13 as set forth in the previous paragraph. If the rejection of claim 13 is maintained, an explanation is requested of the perceived correspondence of specific elements of Mann to the detailed claim limitations.

The Applicant again notes the allowance of Claims 19-22, and thanks the Examiner for favorable consideration of these claims.

CONCLUSION

The Applicant respectfully submits that the pending claims are patentable over the cited prior art of record, and that the application is in condition for allowance. If the Examiner would find it helpful to discuss any issues related to this case, the undersigned attorney of record invites the Examiner to contact him at (651) 686-6633 (x102).

Respectfully submitted,

By _____


LeRoy D. Maunu
Reg. No. 35,274
Crawford Maunu PLLC
1270 Northland Drive, Suite 390
St. Paul, Minnesota 55120
(651) 686-6633